

# KING & SPALDING

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September 25, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically,

1. On or before September 23, 2015, New GM, the Ignition Switch Plaintiffs, certain plaintiffs’ represented by Gary Peller, the GUC Trust, the Ignition Switch Pre-Closing Accident Plaintiffs, the State of Arizona and the People of the State of California each filed “Form Cs” with the Court of Appeals for the Second Circuit in connection with the direct appeal captioned *In re Motors Liquidation Company*, Case No. 15-2844. Relevant excerpts<sup>1</sup> of some<sup>2</sup> parties’ “Form Cs”, are attached hereto as **Exhibits “A”** through **“C”**.

<sup>1</sup> Addendum “A” to Form C calls for the inclusion of certain documents previously filed with the Bankruptcy Court (*i.e.*, notices of appeal, the Judgment dated June 1, 2015, and others) and the docket for Old GM’s bankruptcy case. Due to the voluminous nature of these documents, they were not included in the Exhibits annexed hereto.

<sup>2</sup> Form Cs filed by certain parties were deemed deficient by the Court of Appeals for the Second Circuit, and are unavailable to download at this time.

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2. On September 24, 2015, Judge Furman entered *Order No. 81 [Regarding Amendment of Certain Personal Injury/Wrongful Death Complaints]* in MDL 2543 pending in the United States District Court for the Southern District of New York. A copy of the Order is attached hereto as **Exhibit “D”**; and
3. Today, September 25, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>3</sup> is attached hereto as **Exhibit “E”**.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/ja  
Encl.

cc: Edward S. Weisfelner  
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<sup>3</sup> There are 31 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.